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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 NORMAN, LLC, a Nevada limited liability
16 company,

17 Case No.: 2:22-cv-00837-RFB-EJY

18 Plaintiff,

19 v.

20 NATIONAL DEFAULT SERVICING
21 CORPORATION, an Arizona corporation;
22 BANK OF AMERICA, N.A., a national banking
23 association; NEVADA LEGAL NEWS, LLC, a
24 Nevada limited liability company; DOES I
25 through X and ROE BUSINESS ENTITIES I
26 through X, inclusive,

27 **STIPULATION AND ORDER FOR
28 EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

29 **(FIRST REQUEST)**

30 Defendants.

31 Norman, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have 14 days
32 after the court's adjudication of Norman's motion to remand to file its response to Norman's
33 complaint. ECF Nos. 6 & 7. The court's adjudication of Norman's motion to remand will impact
34 what court BANA files its response—if the motion is granted, BANA will file its response in state
35 court, and if the motion is denied, BANA will file its response in federal court. This stipulation does
36 not preclude BANA from filing its response while Norman's motion is pending, however it sets a
37 firm deadline for BANA to respond should the court deny Norman's motion to remand.

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1 The failure of BANA to previously file its response to Norman's complaint is a result of
 2 excusable neglect since (1) BANA is focusing its attention on its response to Norman's motion to
 3 remand; (2) BANA and Norman are seriously exploring settlement options in this matter as well as
 4 other related quiet title matters in both in this court and in the state district court; and (3) counsel for
 5 Norman and BANA were preparing for trial and then attended trial in state court in a quiet title
 6 matter.

7 This is the parties' first request for an extension of this deadline and is not intended to cause
 8 any delay or prejudice to any party.

9 DATED this 13th day of June, 2022.

10	AKERMAN LLP	HONG & HONG LAW OFFICE
11	<p><i>/s/ Scott R. Lachman</i></p> <p>MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134</p> <p><i>Attorneys for Bank of America, N.A.</i></p>	<p><i>/s/ Joseph Y. Hong</i></p> <p>JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Plaza Drive, Suite 650 Las Vegas, NV 89135</p> <p><i>Attorneys for Norman, LLC</i></p>

17 **IT IS SO ORDERED.**

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Eaynay L. Zouchah
 UNITED STATES MAGISTRATE JUDGE
 Case No. 2:22-cv-00837-RFB-EJY

DATED: June 13, 2022